From: Dietsch, Barbara, BGCM BGCI

Sent: Wednesday, September 17, 1997 3:21 PM

To: foster.haley1@bridge.bst.bis.com

Cc: Klimczak, Claudette, BGCM BGCI; Ray, Susan D, NLIAM

Subject: Status Requested

9/17/97

To: Foster Haley

BellSouth Interconnection Svcs

From: Barbara Dietsch

ATET

Billing & Industry Relations

Foster,

Since our Friday call has been postponed until the afternoon of Monday 9/22, please provide a status of the following, prior to that call.

The latest Usage Matrix was forwarded to you on 9/9/97, no updates and/or completed pages have yet been returned. It is imperative that this data be completed and returned as soon as possible. The data for the states of Georgia and Florida is required immediately; if necessary the balance of the 7 BellSouth states can be returned after that time.

I received the N11 data you compiled for the state of Georgia. Please provide an explanation of the entity ID associated with each service. If these services are different in each state, please provide like information by state, and a separate page 7 of the usage matrix by state.

The correction eliminating the rating of Directory Assistance and DA Call Complete messages (rec'd on 9/15 file), along with the receipt of erroneous cancel messages was scheduled to be implemented on 9/15. Please provide as status of these issues. (15 erroneous cancel messages received on 9/15 file)

Florida (407 NPA) usage continues to be received on the Daily Usage File, and TSR test calls are not being made in the 407 area of Florida. Please provide a status of the edit which BST was to put in place.

The 9/15 file contained three rated 010116 ISP messages (976), however,

it also contained 3 duplicates of these messages as 100131 unrated messages. These messages were dated 9/11/97, from number 404-288-4585, to number 404-976-8255. Please investigate.

As of the 9/15 file, 511 usage is unrated and 211 usage is being received.

Please provide status of messages received with 1B module. (messages are rated, 010101, operator, collect)

There are currently 363 messages which would have been returned to BellSouth, for invalid modules, invalid record ids and insufficient billing data, etc.. As we discussed on our last call, either a returns feed with an associated wholesale bill credit, or a formal paper claims process must be negotiated. Rather than wait for our next scheduled

call, please let me know as soon as you receive a response on this issue.

If you have any questions or comments, please feel free to contact me on (732) 805-1467.

	Usage Matrix (specific matrix issues attached)		
	4/22	usage matrix with state specific data requested from BellSouth	
	6/20/97	usage matrix with state specific data requested from BellSouth	
	6/27	updated usage matrix received - state specific data not included clarifications not noted on matrix	
	7/07	usage matrix with state specific data requested from BellSouth BST committed changes not noted on matrix	
i	7/11	updated matrix received - state specific data, as received verbally, not included BellSouth committed changes not noted on matrix	
•	7/18	state specific data is required immediately -	
•	7/25	BST has committed to provide updated and state specific data on a usage matrix As Soon As Possible	
	8/04	BST will provide GA and FL state specifics, with additional 7 states to follow. Absence of this updated corrected, state specific matrix is hindering AT&T's ability to provide accurate local service	
	9/02	Revised matrix being faxed by Foster Haley to Barbara Dietsch	
•	9/05	Advised BellSouth that usage matrix is still not complete, and updates are not accurate. AT&T will issue a new usage matrix to BellSouth; This matrix should be completed by BellSouth and will be maintained and updated by AT&T upon mutual agreement of issues. This matrix will be forwarded to BellSouth in 2 to 3 business days.	

New Usage Matrix was forwarded to BellSouth on 9/9. As per BellSouth the usage matrix is being completed. AT&T requested the completed matrix, with all available per state data, be completed

9/12

and returned in one week.

	Informati 976 and	on Service Provider
	976	
	5/97	BellSouth has agreed to provide these messages via a rated 010116 record
ı		This portion of this issue will be formally closed when AT&T receives 976 usage as rated 010116 records.
	8/11	Matrix correction to be received ASAP
•	9/02	Matrix reflects 010116 correct record; however, will not be implemented until approved by BellSouth Regulatory
•	9/05	AT&T is not in agreement with the statement made by BellSouth on 9/02. BellSouth agreed, as per 5/97 status, to provide these messages via a rated 010116 record. Also, Attachment 7 Section 3.1 (page 3) of the Interconnect Agreement states that BellSouth will provide rated Information Service Provider usage.
•	9/12	This issue was escalated in the negotiation stages of the Interconnect Agreement, and BellSouth agreed to provide rated ISP usage. This issue was again escalated, when BellSouth made no progress in correcting the ISP usage being received on the DUF; BellSouth again agreed to provide rated ISP usage. This issue is again being escalated.
-	<u>511</u>	
-	5/29/97	BST requested they provide a rate table for AT&T to rate 511 ISP messages - AT&T declined
	6/97	BST was notified that the Interconnect agreement states that BST will provide all ISP messages rated BST agreed to rate 511 messages and forward them on 010116 records
	6/16/97	N11 (511 in GA) usage is received as unrated 100118 records (should be rated 010116)
	6/23/97	Usage continues to be received as unrated 100118 records
	7/09/97	Usage continues to be received as unrated 100118 records
	7/15/97	Usage continues to be received as unrated 100118 records
_	7/18/97	BellSouth (Steve Schmidt) notified me that (as per Shirley Wilcox) incorrect information was provided to AT&T and N11 messages will be sent as 010118 records. BST has decided that this type of message is abbreviated dialing not ISP. AT&T stands by the position that this type message is an Information Provider.
-	7/18/91	BST was notified that this is unacceptable, AT&T has not made special provisions to accept these messages as 010118 records, as per BST's 5/97 notification that these records would be received as rated 010116 records.
-	7/25	BST has stated that the corrections to the Record ID will be implemented by end of next week, also being orked by BST is the rating process to rate all 010116 records. BST was notified that AT&T would like this mplemented with the Record ID correction, by 8/1/97.
-	8/04	BST stated that Record ID and rating corrections were processed effective 8/01/97.
•	8/05	The above stated corrections were processed on Monday 8/04, and should be reflected in usage dated 8/05 on.

		ation Service Provider 1 511 (cont'd) nt'd)
1	8/06	511 messages are being received as unrated 10 01 16 records. BST has agreed to send these messages as rated 01 01 16 records.
•	8/11	As per BST, Record ID correction was scheduled to be completed by 8/05. These messages are being received as 10 01 16 records. Rating of these messages is still being worked by BST.
	9/02	Will not implement 010116 record format until approved by BellSouth Regulatory
	9/05	AT&T is not in agreement with the statement made by BellSouth on 9/02. BellSouth agreed, as per 6/97 status, to provide these messages via a rated 010116 record. As per the 7/25 status, BellSouth stated that a correction to the Record ID was being worked and also a correction to the rating process was being worked to rate 010116 records.
		As of the 8/06 status, 511 usage was being received as unrated 100116; BST agreed to send these messages as rated 010116 records.
•		Also, Attachment 7 Section 3.1 (page 3) of the Interconnect Agreement states that BellSouth will provide rated Information Service Provider usage.
_	9/12	BellSouth agreed, in 6/97, to provided 511 messages as rated ISP messages. This issue was escalated, when BellSouth made no progress in correcting the ISP usage being received on the DUF; BellSouth again agreed to provide rated ISP usage.
		This issue is again being escalated.

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Unidentified N11 usage

- 7/25 811 messages have been received on the usage file. The BST usage matrix states that 811 service is not available.
- Additional 811 message has been received. BST is not aware of 811 usage. BST is investigating 211 usage has been received on the usage file. As per BST, 2 is not a N11 optional number. BST is investigating.
- 8/06 Still receiving 811 & 211 messages. Usage is being received as ISP usage (10 01 16 records)
- 8/11 AT&T investigated these unidentified N11 messages. 211 is an Information Line free call. These messages should not be sent to AT&T. If sent they should be dropped and not rated.
 811 is a Date Line referral service. BST is investigating whether this is a per minute or per message rate; AT&T wishes to receive these messages rated.
- 8/12 Now receiving 311 usage as well as 211 & 811. Notified BST on 8/14, and requested investigation
- 9/02 Still investigating; expected 311, 511, & 711 but not 211 nor 811; will verify all N11s (by LATA) and advise. If free calls will be dropped by BellSouth; if charges apply will treat same as 511 (with BellSouth Regulatory approval)
- 9/05 BST has agreed to forward, in writing, an explanation of all N11 usage. This information has been requested by state. Also, if charges apply AT&T expects BST to treat the usage the same as 511; which BST has previously agreed to forward as rated 010116 records.
- 9/12 BellSouth has agreed to forward explanations of all N11 usage. This information is to be provided for the state of Georgia, by 9/15, with data for the additional 8 states following.

 As of 8/11, AT&T's investigation found that 811 is a Date Line Referral Service, BellSouth is still investigating this.

Directory Assistance

- Some DA Usage is being received as 010132 records rated with a flat rate in the charge field.

 BST has determined that these customers in Macon are being served by Atlanta, and BST is treating the DA usage as rated intraregion incollects. BST has issued an internal work request to correct this issue. A BST committment of 10/15/97 was given for this correction.

 3 months for this correction is not acceptable, since AT&T is providing local service in this part of GA, a two week maximum commitment has been requested from BST.
- 7/25 BST is doing an internal work around to discontinue the rating of these DA messages. Completion of this workaround is expected in two (2) weeks.
- 8/04 Workaround not yet complete.

Some DA usage shows Indicator 17 equal to 4 (BVD validated); BST is currently coding for correction

- 8/04 DA credit record has been received as 03 01 31 and should be 03 01 32. BST is investigating
- Work around not yet complete for rating of specific DA messages

 BST found that Indicator 17 was being populated when not necessary on DA and other record types.

 Correction is being done for all record types, and will remove indicator 17 values from being populated on DA calls.

 BST continues to investigate the DA credit record of 03 01 31.
- 9/02 The 010131 record issue will be corrected by a workaround being tested now; plans are to implement by 9/15/97
 - Indicator 17 equal to 4 issue still being investigated for correction
- requested verification that 9/02 status referred to the implementation of a workaround to correct the receipt of rated 010132 records.

 receipt of a DA credit record as 030131 is still under investigation by BST.

 correction of indicator 17 being equal to 4, is still being investigated by BST
- 9/12 BellSouth provided no status on rated DA usage. As of 8/26, some DA usage continues to be received rated.

 BellSouth provided no status on the incorrect DA credit record, or the incorrect population of indicator 17.

Directory	Assistance
Call Con	nolete

9/12

As per BellSouth, 9/15 implementation is expected.

Usage matrix BST stated that DACC messages would be forwarded as follows: 100132 DA portion of call 100101/31 actual msg with ind 24=3 If the call complete portion of the call is a local free, why will BST forward a chargeable msg 6/18 BST stated that DACC msgs would be forwarded as follows: 100118 with ind 24=3 for DACC 100101/31 with no value set in ind 24 Why will BST forward 100101/31 for a local free msg 6/26 updated usage matrix provided BST's correction of DACC messages as follows: 100132 for DA portion of call 100118 with ind 24=3 as call complete portion if toll call a separate 100101/31 msg will be sent (unmatched to DA/CC portions) Issue Closed REOPEN 8/06 DACC messages from customers in Macon being served out of Atlanta (see DA issue), are being treated by BST as intraregion incollects and are being forwarded as rated messages. Will this be corrected when the DA records are corrected? 8/11 System changes are required for the correction of this issue. BST is doing a work around until final correction of this error. Estimated date of implementation of the work around will be provided 8/13. 9/02 Work around currently being tested; implementation planned by 9/15/97 9/05 Awaiting 9/15 implementation of correction.

Star Features

7/96	BellSouth committed to send this usage to AT&T as unrated 425001 records, with a distinguishing value in position 172.
6/16	Usage for 3Way Calling was received from BellSouth as rated 010101 record with no value in position 172
6/20	BellSouth committed to corret this situation by 7/1/97.
6/30	Usage for Return Call was received as a rated 425001 record with no value in position 172. 3 Way Calling not yet corrected.
7/09	3 Way Calling and Return Call were both received as 425001 records with a correct value in position 172, however, mesages were still rated
7/15	Star Features sent with correct record ID, with correct value in position 172, however, these messages continue to be received rated
7/25	BST has committed to discontinuing the rating of these messages by the end of next week. State specific data in reference to Star Features has been requested As Soon As Possible.
8/04 8/05	BST stated that corrections to rating of these messages were processed 8/01. BST corrections were processed on 8/04, corrections should be reflected in usage dated 8/05 and later.
8/06	42 50 01 records are received unrated with a value populated in position 172.

Issue Closed

Not discussed on 9/02 call with BellSouth

Erroneous Usage

	8/06	rated 01 01 01 records	Operator Station Collect/Inmate Calls Operator Assisted AT&T expects to receive these messages as unrated 10 01 01/31 records
	8/11	BST investigating, messa	age seems to be handled as rated incollect.
	8/06	rated 51 50 01 record	50 is not a valid group for a category 51 record a summary rated cancel record is questionable
	8/11		ner a charge record is associated with this cancel record. The use of a group 50 (summary record) as a cancel billable record
	9/02	Rated 010101 records iss to be implemented by 9/1	sue will be corrected by fix currently being tested which is planned 15/97
ı		Rated 51 50 01 issue still	l being investigated
•	9/05	Awaiting 9/15 implementation of correction. (rated 010101 records with invalid modules) awaiting status on rated 515001 record	
•	9/12	These messages, treated Upon implementation of invalid modules.	still expected for correction of rated 010101 collect calls. d by BellSouth as incollects, have been received with invalid modules. of the rating correction, further investigation can be done on the
-		any credits associated	

Header/Trailer Records

	BST has agreed to forward header and trailer records using a 202001 and 202002, as requested in AT&T's requirements
	BellCore has agreed to standard header and trailer record ID's of 202401 and 202402
6/18	BST has agreed to implement the BellCore standard header and trailer record Ids implementation date not yet available
6/27	BST has provided an implementation date for 2024XX header trailer records of 9/97
7/25	This issue will be formally closed upon the implementation of the 2024XX records
Not dis	cussed on 9/02 call with BellSouth
9/05	AT&T must have the implementation date for the new H/T records two weeks prior to implementation. Request BST provide this date in writing.
9/12	AT&T notifed BellSouth of the criticality of being provided an implementation at least 2 weeks prior to implementation.

ISP Taxes

5/29	BST is forwarding ISP messages to AT&T rated, will BST Calculate and Remit the following taxes on these messages? Sponsor Tax End User Tax
6/18	BST is not aware of a sponsor tax BST is investigating whether state tax will be applied by BST at rating
7/07	BST still investigating
7/18	This information is required immediately - if BST is rating ISP messages, will end user taxes be calculated at rating? Will BST remit these ISP taxes?
7/25	BST does not yet have any additional information of the taxing of ISP messages
8/04	Rating of ISP messages should be reflected in usage dated 8/05 and later. BST will verify whether their rating process is taxing these messages.
8/11	Fix has been implemented to correct the ISP record ID, however, the fix has not yet been implemented to begin rating these messages; BST believes that taxing will be automatic with their rating process. BST will verify all ISP tax processes with their internal strategy organizations.
9/02	Waiting on BellSouth Regulatory Approval for providing rated ISP messages; taxes will be included if rated
9/05	As stated in status of ISP issue, the rating of these 010116 ISP records has previously been agreed to by BST. AT&T requires verification that taxing of these messages will be automatic with the rating process.
9/12	This issue is escalated with all ISP rating issues.

5/29	Will AT&T encounter blocking restrictions on ISP message? Can Separate blocks be applied for 900 and 976 messages
6/18	BST still investigating the possibility of separate blocks
6/27	BST can apply separate blocks to 900 and 976 messages
6/30	LFT requested this be reverified with BST
7/07	BST still investigating
7/18	Contrary to information previously supplied by BST - separate 900/976 blocking is not available in GA BST is verifying the availability of separate 900/976 blocking in FL and AL

Separate block is not available for GA. Status required for balance of 6 states.

Separate blocking for 976 is available in FL and AL.

No status for the balance of the 7 states.

900 vs 976

7/25

9/05

9/12

TSR vs UNE Indicator

BellCore has approved the use of Indicator 4 to differentiate TSR from UNE usage.

- 7/25 BST has not begun populating Indicator 4.

 Steve was not aware that this Indicator was a BellCore approved standard, and will investigate an implementation date.
- 8/04 BST has committed to implement the use of Indicator 4 to differentiate TSR and UNE usage. Implementation date is currently ASAP.
- 8/06 Indicator 4 is not yet populated.
- 8/11 BST will implement Indicator 4 after final approval of BellCore, and issuance of updated EMR format
- 9/08 AT&T will request BST implement Indicator 4 prior to BellCore's issuance of updated EMR format.

 If required by BST, AT&T will provide written BellCore documentation of the acceptance of Indicator 4 as standard.
- 9/12 AT&T requested BellSouth's immediate implementation of Indicator 4. BellSouth requires internal approval prior to implementation. Response has been requested As Soon As Possible.

Florida/North Carolina Usage

- 7/25 Florida usage has been received on the TSR usage file, which should consist only of Georgia usage at this time.
- Florida usage continues to be received on the TSR daily usage file, North Carolina usage is also being forwarded on the BST daily usage file.

 The accounts, for which FL and NC usage have been received, appear to BST as provisioned to AT&T local. AT&T has not yet provisioned account in FL or NC; BST is investigating why these accounts appear to be provisioned as AT&T local accounts, and if they are being billed by BST.
- Florida usage was received from one number, BST records showed the OCN as AT&T but not the bill number. BST has corrected this, this usage should no longer be received by AT&T.
- North Carolina usage was received from one number, BST records showed a bill to number and OCN reflecting AT&T. BST records have been corrected, this usage should no longer be received by AT&T.
- Florida usage again appeared on the 8/12 and 8/13 usage files received from BST. Florida customer account number is 561-683-1208. BST has been notified and correction requested. Additionally requested BST take proactive measures to assure that this does not continue. AT&T has no means to return these messages to BST.
- 9/02 Service Order edits will be in place by 9/8/97 to correct messages being sent to AT&T when the customer is not AT&T's.
- 9/05 edit not yet in place.
- 9/12 Small amounts of Florida usage being received. Edit not yet in place.

Busy Line Verify/Interrupt

- 9/02 Busy Line Verification/Emergency Interrupt: BellSouth agrees that in accordance with their tariffs BLV may be a stand along charge while EI must always include the BLV charge. BST is investigating if they combine the BLV/EI charge into one record owr expectation was to always receive an 010135 record (BLV) with an 010137 record (EI).
- 9/05 BST investigating for verification
- 9/12 BST investigating for verification

Ga. County Wide Free Calling

9/02 BellSouth has advised that they will drop any local and/or intraLATA county wide calls that are free; no free calls will be passed to AT&T via local usage.

ATTACHMENT 8

RECEIVED JUL 2 9 1997



G. R. (Greg) Follenebee

Director - Regulatory Public Policy State Government Affairs Room 6030 1200 Peachtree St. NE Atlanta, GA 30309 404 810-7550 FAX 404 810-7341

July 30, 1997

Jerry D. Hendrix BellSouth Telecommunications, Inc. 675 West Peachtree St., Room 29L65 Atlanta, GA 30375

Dear Jerry:

This letter responds to your July 16, 1997, letter regarding Mike Pfau's testimony in the Georgia Section 271 proceeding and Becky Bennett's July 10th letter to Gary Romanick regarding performance measurements and Attachment 12.

We believe that both Ms. Bennett's letter and Mr. Pfau's testimony are consistent the spirit and the substance of our negotiations regarding performance measurements, and AT&T resents any impression in your letter that AT&T has disregarded the truth.

Although you fail to specifically identify the statements you believe to be inaccurate, it appears that you are concerned about testimony and statements about AT&T's support for the performance measurements advocated by the Local Competition Users Group ("LCUG"). Both Ms. Bennett and Mr. Pfau state that AT&T supports the use of LCUG metrics. Nothing in these statements is contrary to the positions taken during our negotiations on Attachment 12. Although AT&T and BellSouth agreed to continue with their own negotiations because of the Georgia Commission's deadline and the progress we had made, AT&T never intended such action to diminish the corporation's support for LCUG activities and the use of such measurements as we move forward in performance.

Indeed, AT&T does not believe our negotiations on Attachment 12 preclude consideration of LCUG measurements for those areas where additional negotiations are necessary or as potential changes to those measurements for which agreement has been reached. For example, in our previous negotiations on Attachment 12, we agreed to negotiate at a later date the intervals for provisioning of Unbundled Network Elements. In those

Jerry D. Hendrix July 30, 1997 Page 2

negotiations, AT&T believes the use of the LCUG intervals to be appropriate. There is nothing in our negotiations on Attachment 12 that remotely could be interpreted as a waiver of AT&T's right to use the LCUG standards and Ms. Bennett's letter and Mr. Pfau's testimony both are consistent with this position.

Additionally, although AT&T and BellSouth reached agreement on a number of issues in Attachment 12, there are a number of issues and implementation details left to be negotiated. These issues are accurately discussed in Mr. Pfau's testimony, and Ms. Bennett's letter and although BellSouth wishes to characterize Attachment 12 as complete in its Section 271 testimony, the fact remains that much work still is required.

Finally, there are several issues in BellSouth's recent testimony on performance measurement that I wanted to bring to your attention. First, BellSouth's witness, William N. Stacy, has stated that AT&T agreed during our negotiations to the use of Statistical Process Control ("SPC") as a measure of parity. This is incorrect. The use of SPC was never a topic of discussion in our negotiations. If you recall, in our negotiations we discussed that each state's results differed every month. Therefore, we agreed to compare actual numerical performance for a given metric for a given month for parity purposes. Second, Mr. Stacy has stated that AT&T agreed that the first performance data BellSouth would provide AT&T under Attachment 12 would be for August and that such data would be provided in September. This is not correct. When we completed the negotiations leading to the May filing in Georgia, AT&T understood that most of the data was going to be provided within a month of our agreement. AT&T continually has requested such data from BellSouth, but, in this regard, BellSouth has not complied with the letter or the spirit of our negotiations. Indeed, in Ms. Bennett's July 10 letter AT&T requested (for the third time) May and June data by July 17. 1997. BellSouth has not responded to that request. Interestingly, although BellSouth has stated in implementation negotiations that AT&T-specific data could not be provided until September, Mr. Stacy's July 11, 1997, rebuttal testimony in Georgia includes AT&T-specific data for several provisioning metrics. Third, Mr. Stacy has stated in cross examination in Georgia that during our negotiations BellSouth offered "the ability to AT&T... to audit... results or have an auditor examine the results...." Jerry, as you are no doubt aware, the only BellSouth offer regarding auditing we discussed was for auditing the provisioning intervals to insure parity. If BellSouth wishes to provide AT&T broader auditing capability, I am sure we can reach some agreement. However, to date BellSouth has not made such an offer.

98%

Jerry D. Hendrix July 30, 1997 Page 3

In closing, AT&T believes that it is not appropriate or necessary for AT&T to make any corrections to the record. BellSouth, however, should consider correcting Mr. Stacy's testimony to more accurately reflect our agreement.

Sincerely,

Gregory R. Follensbee

Lug

GF:wdm

cc: Mary Jo Peed, Esq. David Eppsteiner, Esq.

AX			Date: 07/30/ Number of pages	77 including cover sheet:
To:	Jerry Hendrix		From:	Greg Follensbee
	BellSouth Telecomm	unications		
	Room 34S91			
	675 W. Peachtree St. Atlanta, GA 30375	<u></u>		
Phone:	404-927-7503		Phone:	404-810-7550
Fax phone:	404-529-7839		Fax phone:	404-810-5673
CC:				·
REMARKS:	Urgent	For your review	□ Reply ASAP	☐ Please comme
REMARKS:	Urgent	For your review	□ Reply ASAP	☐ Please comme

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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

	In the Matter of		
	Application of BellSouth Corporation, BellSouth Telecommunications, Inc., And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in South Carolina)))	CC Docket No. 97-208
	AFFID	AVIT	
•	О	F	
	JAMES A. TA	MPLIN, JR.	
	ON BEH	ALF OF	
•	AT&T	CORP.	
_	AT&T EX	KHIBIT K	

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